IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

CR NO. 11-1213 MCA

DENNIS LOVATO,

Defendant,

FIRST ADDENDUM TO MOTION IN *LIMINE* TO INTRODUCE CHARACTER EVIDENCE AND EVIDENCE OF VIOLENT REPUTATION FOR THE ALLEGED VICTIM

COMES NOW Defendant Dennis Lovato, by his attorney, John F. Moon Samore, Esq., pursuant to the Rules, for his First Addendum to Motion in *Limine* to Introduce Character Evidence and Evidence of Violent Reputation for the Alleged Victim, to STATE:

The following witness is added to said Motion in *Limine* to Introduce Character Evidence prior to, as a matter of right, the Government's Response, by adding the following named witnesses:

Edward Chavez has lived in the community most of his life and served as Governor of Santo Domingo Pueblo in 2003 and Superintendent of Santa Fe Indian School. He is a professional engineer and also serves on the Santa Fe Indian School Board of Trustees. Mr. Lucero, aka "Youngblood," is on known in the community as a dangerous person, reputed to carry a knife or knives, tribal leaders were always on the defensive when they were dispatched to his home on various and sundry occasions. Youngblood was known to host wild drinking parties that often descended into violence, usually kept alcoholic beverages at his trailer, assaulted pueblo citizens and family members with and without his knife in the last thirty years in Santo Domino Pueblo, right up until the time when he died.

WHEREFORE, Defense prays that is witnesses also be considered as willing to attest to the violent reputation of the alleged victim, Mr. Lucero and pledges to identify additional character witnesses at least ten days prior to any hearing on this Motion to permit Government agents sufficient time to interrogate these witnesses.

Respectfully submitted,

/s/ John F. Moon Samore, Esq.
Attorney for Defendant
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I hereby certify that a true and correct copy of the foregoing document was faxed to opposing counsel on the 30th day of August 2013.
/s/ John F. Moon Samore, Esq.